

EXHIBIT C

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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BETTY ANNE WATERS, AS  
Administratrix of the Estate  
of KENNETH WATERS,  
Plaintiff

VS

TOWN OF AYER, NANCY  
TAYLOR-HARRIS, In Her  
Individual Capacity, ARTHUR  
BOISSEAU, In His Individual  
Capacity, BUDDY DECOT, In His  
Individual Capacity, WILLIAM  
ADAMSON, In His Individual  
Capacity, PHILIP L. CONNORS,  
In His Individual Capacity,  
AND JOHN DOE AND JANE DOES  
1-16, In Their Individual  
Capacities,  
Defendants

CIVIL ACTION  
NO. 04-CV-10521-GAO

\*\*\*\*\*

REPORTER'S TRANSCRIPT OF PROCEEDINGS RE  
SCHEDULED DEPOSITION OF ROSEANNA BAGGESEN A/K/A ROSEANNA  
PERRY A/K/A ROSEANNA C. PETERSON A/K/A ROSIE A. PERRY

BE IT REMEMBERED that, pursuant to Notice of  
Taking Deposition, and on Friday, May 4, 2007, commencing at  
the hour of 11:07 a.m., thereof, at the offices of Kopelman  
and Paige, 101 Arch Street, Boston, Massachusetts, before me,  
Kathleen M. Benoit, Professional Shorthand Reporter and  
Notary Public in and for the Commonwealth of Massachusetts,  
the following proceedings were had.

APPEARANCES:

JOSEPH L. TEHAN, JR., ESQ., Kopelman and Paige, P.C., 101  
Arch Street, 12th Floor, Boston, MA 02110, For the plaintiff

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1                   P R O C E E D I N G S

2                   (Exhibit Nos. 1 and 2 marked.)

3                   MR. TEHAN: For the record, my name is Joseph  
4 Tehan. I represent all the defendants in this case. I am  
5 here for the deposition of Roseanna Perry who is also known  
6 as Rose Anna Perry, two different, a different first and  
7 middle name rather than joined as in the first instance,  
8 who is also known as Roseanna C. Peterson and as Rosie A.  
9 Perry. Finally, I believe she also has an alias of  
10 Roseanna C. Baggesen B A G G E S E N.

11                   In order to subpoena Mrs. Baggesen or  
12 Miss Baggesen/Perry, to the deposition, we first effected  
13 service on her on March 22, 2007, at the address of 15  
14 Fairfield Avenue, No. 1, in Providence, Rhode Island. That  
15 service was effected by leaving a copy of the deposition  
16 subpoena taped to her door and mailing to her a second copy  
17 at that address, and, again, that service was effected on  
18 March 22, 2007. The record of that subpoena and return of  
19 service have been marked in this deposition as Exhibit 1.

20                   Thereafter, on April 6, 2007, we  
21 attempted to effect service once again on our deponent, in  
22 this instance at 31 1/2 Bloomfield Street in Pawtucket,  
23 Rhode Island. In this instance, the return of service,

1 which is appended to the subpoena and marked as Exhibit 2,  
2 reflects that two attempts at service were made. One was a  
3 mailing of the subpoena at the address which I have given,  
4 and the second was, again, leaving a copy of the subpoena  
5 taped to the door. In this instance, the return of service  
6 on April 6, 2007, notes that the address was confirmed by  
7 name on mailbox.

8                   The deposition of Ms. Perry was to have  
9 proceeded at 10 o'clock this morning. It is now 11:07 by  
10 my watch and she has failed to appear and has failed to  
11 contact this office in response to the subpoenas. Pursuant  
12 to a prior agreement, plaintiff's counsel has remained at  
13 his office pending Miss Perry's arrival. He has agreed  
14 that since she has not appeared by this time that he  
15 authorizes my making the statement which I am now making  
16 and that together we will discuss bringing the matter  
17 before the court in an attempt to compel her attendance.

18                   (Whereupon the proceedings adjourned at 11:07  
19 a.m.)

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